

1 expert for making such assessments." He's
2 referring to risk assessments for recidivism.

3 "I'm the Seattle Police
4 Department's designated expert because of my
5 extensive experience in and knowledge about
6 convicted sex offenders and their risk to the
7 community. I've been called to testify as an
8 expert witness in state courts on a number of
9 occasions regarding the risk of reoffense of
10 individual sex offenders.

11 "As an expert witness, I've
12 testified for the prosecution, for the defense
13 and for both the prosecution and defense."

14 He is a professional in his field.
15 He is certainly qualified to make
16 determinations on risk assessment. He has
17 made the determination as to Mr. Titus
18 personally, so to that extent he's certainly
19 a fact witness and Your Honor can take
20 official notice that the State of Washington
21 has identified Mr. Titus as a Level 3 sex
22 offender. That's a fact of which you could

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 take official notice.

2 MR. LYON: Actually, it was the
3 Seattle Police Department, not the State of
4 Washington.

5 MR. SCHONMAN: Correction, that's
6 true.

7 MR. LYON: And technically it --

8 MR. SCHONMAN: Using the state
9 models that the State of Washington has
10 directed the detective to use, the detective
11 made the determination that Mr. Titus is a
12 Level 3 sex offender and that is a matter of
13 which Your Honor can take official notice.

14 MR. LYON: Your Honor, if I may?

15 ADMIN. JUDGE SIPPEL: Yes.

16 MR. LYON: The fact that an expert
17 makes a determination. Yes. It's a fact.
18 But it doesn't take it out of the expert
19 testimony.

20 Dr. Allmon has made factual
21 determinations regarding Mr. Titus. However,
22 I'm not going to sit here and tell you that

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Dr. Allmon is a fact witness because he's not.
2 The factual determination he made was based on
3 an opinion just like the factual determination
4 that Mr. Shilling made was based on an
5 opinion.

6 The model that is used by the
7 Seattle Police Department happens to be a
8 model that Mr. Shilling admits he picked. It
9 is impossible to differentiate the factual
10 determinations of Detective Shilling and his
11 opinion because the facts that the Bureau
12 would purport to have Mr. Shilling testify to
13 are all based on his opinion determinations.

14 That makes him an expert witness,
15 Your Honor, and I think I should have been
16 entitled to a report in advance.

17 ADMIN. JUDGE SIPPEL: Well, it's a
18 question of the cart before the horse. But
19 I'm listening very carefully to what both
20 sides are saying.

21 Did you have some objection to
22 something that --

1 MR. KNOWLES-KELLETT: Yes. He
2 said that Dr. Shilling picked the model. He
3 did not. He was on the end of sentence review
4 committee that picked the model. But it was
5 not Dr. Shilling. He used the model he's
6 required to use.

7 ADMIN. JUDGE SIPPEL: Well, it
8 says on page six. It says that the model that
9 the committee members selected in which the
10 Seattle Police Department uses today is one of
11 the best available actuarial models.

12 MR. KNOWLES-KELLETT: Yes. He's
13 required by the State of Washington to use
14 that model though.

15 ADMIN. JUDGE SIPPEL: How in the
16 heck -- how does he know it's one of the best
17 available?

18 MR. SCHONMAN: Because he was on
19 the panel that picked -- at that point in time
20 when the State of Washington was determining
21 which models to use, Detective Shilling sat on
22 the committee.

1 ADMIN. JUDGE SIPPEL: Well, it's
2 one of the best models in Seattle.

3 MR. SCHONMAN: No, sir. There is
4 a point in time when the State of Washington
5 was considering what model to employ.
6 Detective Shilling sat on the committee as I
7 understand it to review various models and
8 make recommendations.

9 ADMIN. JUDGE SIPPEL: Well, what
10 are the various? I mean, how broad does the
11 various go?

12 MR. KNOWLES-KELLETT: He can
13 testify if you want. He can tell you what he
14 knows.

15 ADMIN. JUDGE SIPPEL: Well, that's
16 what I'm saying. I don't know what I'm being
17 offered here. You're offering here; I'm
18 supposed to buy this lock, stock and barrel?

19 MR. SCHONMAN: The fact is --

20 ADMIN. JUDGE SIPPEL: The Seattle
21 Police Department uses one of the best
22 available actuarial models?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 I mean, this is not part of the
2 case or anything, but I know just from general
3 reading that places like Scandinavian
4 countries, they've gone into this stuff, you
5 know, upside down, and around and over. And
6 I doubt very much whether or not they've
7 considered Scandinavian models.

8 MR. KNOWLES-KELLETT: But he's on
9 INTERPOL. He works with the Scandinavians on
10 this.

11 ADMIN. JUDGE SIPPEL: Well, then
12 he's considered all of those models world-
13 wide?

14 MR. KNOWLES-KELLETT: It's not his
15 choice though. Washington State selected the
16 model. He used the model --

17 ADMIN. JUDGE SIPPEL: Well, then
18 how does he know that it's one of the best
19 available? How does he know?

20 MR. KNOWLES-KELLETT: That's his
21 opinion. Does not say -- it's his opinion
22 it's one of the best.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 MR. SCHONMAN: Your Honor, you can
2 give his opinion what weight you want it.

3 ADMIN. JUDGE SIPPEL: Yes, it says
4 in my opinion as an expert, but he's sitting--

5 MR. SCHONMAN: You can give his
6 opinion whatever weight you deem appropriate.
7 He can sit here and you can ask him questions
8 about what he considered or what
9 recommendations the committee made.

10 ADMIN. JUDGE SIPPEL: Well, you're
11 making this awfully difficult for me.

12 I mean, if this statement had been
13 proffered under Rule 26 ahead of time and that
14 he had, you know, a specific statement that
15 was given to Mr. Lyon and Mr. Lyon cross
16 examined on this, then, you know, I wouldn't
17 have to spend my time on it that much.

18 You know, it would be either in,
19 out or whatever. But now you want me to do
20 the voir direing of this person to satisfy
21 myself that he is qualified to say that this
22 model is one of the model available actual

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 model.

2 MR. SCHONMAN: Your Honor, I'm not
3 suggesting that you personally have to do all
4 the voir dire. I'm sure Mr. Lyon would be
5 delighted to do that. And if Your Honor is
6 satisfied then he can be determined to be an
7 expert.

8 If Your Honor is not satisfied
9 then he'll appear and give his professional
10 opinion because he's personally familiar with
11 these facts.

12 ADMIN. JUDGE SIPPEL: Well, as you
13 say, you start to seek between facts and what
14 are not facts, you know. I'm just thinking
15 here supposing, you know, supposing Mr.
16 Greenspan was a witness to a traffic accident
17 and he was called as a witness to testify as
18 a fact to what happened at the traffic
19 accident. That's all he's going to testify to
20 is what happened at the traffic accident.

21 You can't boot strap Mr.
22 Greenspan to say, well, what is this injured

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 person's prospective life earnings in light of
2 what happened to him. I mean, he might be
3 very qualified to give that opinion, but
4 that's not what's he's on the stand for.

5 This person is on the stand for a
6 fact witness. He's not there as a fact
7 witness who is going to give a bunch of
8 opinions.

9 Now, as I said up front I don't
10 want to cut him off. On the other hand, he's
11 going to be severely limited it seems to me.
12 He certainly isn't going to come in here and
13 say that this is one of the best available
14 models. The fact that he used the model, the
15 model was used. Okay.

16 MR. SCHONMAN: That's fine, Your
17 Honor.

18 ADMIN. JUDGE SIPPEL: That's fine.

19 MR. KNOWLES-KELLETT: He doesn't
20 have any choice. He's not going to use any
21 other model.

22 ADMIN. JUDGE SIPPEL: So, I could

1 strike that?

2 MR. KNOWLES-KELLETT: Whether it's
3 the best available --

4 ADMIN. JUDGE SIPPEL: I mean,
5 theoretically if I this were an admission
6 session, you wouldn't have any objection to my
7 striking it?

8 MR. KNOWLES-KELLETT: Just say --
9 call it the required model,.

10 ADMIN. JUDGE SIPPEL: Well, I'm
11 not going to say what I would call it. But
12 I'm trying to test what you're trying to tell
13 me.

14 You would have no objection to my
15 striking this, one of the best available
16 actuarials?

17 MR. SCHONMAN: Your Honor, we're
18 not making an argument because we're not in an
19 admissions session. I would say theoretically
20 you're right. You're right.

21 ADMIN. JUDGE SIPPEL: Well, I'm
22 trying to get something more than theoretical.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MR. SCHONMAN: We would not have a
2 problem with that.

3 ADMIN. JUDGE SIPPEL: That's not
4 what you're trying to prove through him.
5 You're not trying to prove through him that
6 Seattle has one of the best models. And all
7 you are trying to do is --

8 MR. SCHONMAN: That is precisely
9 correct because it is our position that the
10 model that he used and the methods that he
11 used are not an issue here. Because the fact
12 of the matter is Mr. Titus is a Level 3 sex
13 offender and Detective Shilling can explain in
14 as much detail as Your Honor deems appropriate
15 to explain what it means to be as Level 3 sex
16 offender.

17 But just as Your Honor would not
18 relitigate a prior conviction, that's a given.
19 I don't see this, Your Honor, relitigating or
20 attempting to relitigate the basis upon which
21 he was assessed a Level 3. That is a fact
22 that you can take official notice of that he

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 is a Level 3 sex offender.

2 We're not relitigating whether it
3 was right or wrong, appropriate. It's a given
4 just like a conviction is a given.

5 ADMIN. JUDGE SIPPEL: I mean,
6 you're mixing apples and oranges. If you've
7 got a conviction and the person has had a
8 right to a trial. I mean, even if's it's a
9 plea. Or a person's got a right to a trial by
10 jury. The burden of proof is significant for
11 the Government. They've got to prove beyond
12 a reasonable doubt.

13 That's not the situation here.
14 Basically, it's an administrative
15 determination by some group who, you know, we
16 really have no knowledge and I'm not here to
17 try the case to determine as a collateral
18 issue, you know, what they did.

19 But they sat around in a room some
20 place and said that we're going to make him a
21 Level 3.

22 MR. SCHONMAN: Well, Your Honor, I

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 think you may be underestimating the process
2 that's involved.

3 ADMIN. JUDGE SIPPEL: I may be.

4 MR. SCHONMAN: But I hope Your
5 Honor -- I hope, Your Honor --

6 ADMIN. JUDGE SIPPEL: I agree with
7 that.

8 MR. SCHONMAN: -- does not intend
9 to evaluate the process that the State of
10 Washington and the Seattle Police Department
11 uses to determine whether an individual is a
12 Level 2 or Level 3 or a Level 1 or whatever.

13 The process that the Seattle
14 Police Department uses and that the State of
15 Washington has directed the Seattle Police
16 Department to use is not a matter at issue
17 here. And I hope Your Honor is not going to
18 try to evaluate on the basis of witnesses that
19 appear here whether the process that the
20 Seattle Police Department uses is appropriate
21 or not. That's way beyond our expertise, I
22 would think.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 ADMIN. JUDGE SIPPEL: Well, I
2 thought you were pushing me in that direction.

3 Mr. Lyon. Let me hear Mr. Lyon.

4 MR. LYON: Your Honor, essentially
5 what I hear Mr. Schonman saying is, he's a
6 Level 3. Seattle determined he's a Level 3.
7 You've got to accept that and based on that,
8 you've got to determine he's a danger as a
9 ham.

10 If the model that was used by
11 Detective Shilling is the model I think it
12 was, it's apparently based on a group of high
13 risk sex offenders of adult age out of
14 Minnesota. And I had a rebuttal witness who
15 is going to say that that's an entirely
16 inappropriate model to use on someone who is
17 18 years old when he committed his offense.

18 I think that I don't want to retry
19 what Detective Shilling did, but I think I
20 have a right to show that what Detective
21 Shilling did is not probative to your
22 determination.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 And so I just want to make that
2 clear for the record that I think there's
3 serious, both procedural and substantive
4 issues with that Level 3 determination among
5 which my client wasn't told he had any right--
6 if he does have any right to contest it. And
7 that it's based on faulty assumptions.

8 At this moment I have no clue as
9 to what Detective Shilling actually did. I'm
10 not sure what model he used. I'm not sure if
11 he used the model appropriately and I think
12 all of those facts are definitely relevant and
13 may be material to your determination on
14 whether the fact that my client committed a
15 sex offense 15 years ago, now disqualifies him
16 from having a ham license.

17 MR. SCHONMAN: Well, Your Honor,
18 if I may be heard?

19 ADMIN. JUDGE SIPPEL: Yes. Go
20 right ahead.

21 MR. SCHONMAN: I think what we're
22 entering down a very slippery slope here.

1 Your Honor, at the risk of repeating myself,
2 Your Honor would not inquire as the validity
3 of an underlying conviction. You would take
4 that as official notice that a person has been
5 convicted and he is a convicted felon.

6 Similarly, I would hope Your Honor
7 is not going to inquire as to whether the
8 processes used by the Seattle Police
9 Department are valid or not. The fact of the
10 matter is, the Seattle Police Department
11 employed a process dictated by the State of
12 Washington and that is a given.

13 The fact of matter is, the person
14 is a Level 3 sex offender and that fact, of
15 which you can take official notice. That fact
16 is relevant as to whether he should keep his
17 license.

18 Now, Your Honor has to make a
19 determination, what is the impact of a Level
20 3 sex offense status on an individual's
21 entitlement to retain his ham radio license.
22 And it's a difficult question. And you have

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 to evaluate what effect the Level 3 sex
2 offender status has on his conviction which
3 happened several years ago. And we believe
4 that Detective Shilling will certainly be able
5 to provide you with the benefit of his
6 experience and knowledge as to what it means
7 to be a Level 3 sex offender.

8 But I do not think that the
9 process that he employed or the validity of
10 the models he used are in any way an issue in
11 this. That is totally a collateral issue.

12 Just as you would not inquire to
13 the underlying basis for a conviction,
14 similarly you should not inquire into the
15 underlying basis for how he was given a Level
16 3 status.

17 ADMIN. JUDGE SIPPEL: Well, I told
18 you that I don't see your apples and oranges
19 when you're going to a conviction versus this.
20 But I mean, I'm not going to change my
21 thinking in that respect. As I say, I'm not
22 just saying that this Level 3 business is a

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 lot of stuff and nonsense and that they didn't
2 use some kind of a good procedure to get
3 there. I don't know that.

4 Supposing that I'm trying to take
5 this to see how far you want to take this.
6 Supposing that he were determined to be a
7 Level 3 whatever in North Dakota, you know, or
8 in Oregon or in a court in Brooklyn. Would
9 that make any difference? I mean, would I
10 care?

11 MR. SCHONMAN: In what regard? I
12 guess I don't understand your question.

13 ADMIN. JUDGE SIPPEL: In regard to
14 you don't understand the question.

15 In regard to exactly what you're
16 saying. You're saying that it's a given that
17 he is a Level 3.

18 MR. SCHONMAN: He is a Level 3.
19 He was placed in hearing because of the
20 combination of his Level 3 sex offender status
21 and his prior convictions.

22 ADMIN. JUDGE SIPPEL: Well, is my

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 question not clear? I'm saying, supposing
2 hypothetically it was North Dakota. It wasn't
3 Seattle.

4 MR. SCHONMAN: Then it shouldn't
5 make any difference.

6 ADMIN. JUDGE SIPPEL: So, any
7 court -- any place -- any jurisdiction in the
8 country who had decided that he was a Level 3,
9 I shouldn't care.

10 MR. SCHONMAN: He is a Level 3.

11 ADMIN. JUDGE SIPPEL: Like a Level
12 3 for the rest of his life as regardless of
13 what was done, where it was done or how it was
14 done.

15 MR. SCHONMAN: Your Honor, the
16 legislature of whatever jurisdiction has
17 determined that based on their law, whatever
18 jurisdiction it is, that this person warrants
19 a Level 3 rating.

20 ADMIN. JUDGE SIPPEL: What about
21 Beijing, China? Do I have to give hominy to
22 that?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 MR. SCHONMAN: I don't know, Your
2 Honor, but I think that may be stretching the
3 limits.

4 ADMIN. JUDGE SIPPEL: So, you
5 really are working with some kind of a rubber
6 band here. I mean, there are levels to all of
7 this. I mean, this is not an absolute.

8 MR. SCHONMAN: I don't know that
9 anything is absolute, sir.

10 ADMIN. JUDGE SIPPEL: Okay.

11 MR. SCHONMAN: But I would say
12 that we're dealing with the Seattle Police
13 Department, a Seattle resident, the Seattle
14 legislature and the governor have passed
15 legislation dictating the model that's to be
16 used. The model was used. We're not here to
17 review whether the governor or the legislature
18 did or did not do the right thing.

19 The man has been identified as a
20 Level 3 sex offender. That is a fact you can
21 take official notice of. And the question
22 before the Court now is what's the impact of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 that as well as his convictions on whether he
2 should retain his amateur radio license?

3 ADMIN. JUDGE SIPPEL: But we don't
4 know how it was applied. We know that there
5 was this standard, that there was a standard
6 established by all the jurisdictional bodies
7 that you're talking about within the State of
8 Washington. But we don't know how it was
9 applied.

10 MR. LYON: And, Your Honor, I'll
11 point out that the legislation doesn't specify
12 the model. As of right now we don't even know
13 what the model is.

14 ADMIN. JUDGE SIPPEL: Well, as I
15 said --

16 MR. SCHONMAN: Well, Your Honor,
17 perhaps we should bring in witnesses from the
18 legislature to determine the models and I mean
19 if you want to --

20 ADMIN. JUDGE SIPPEL: Too late.

21 MR. SCHONMAN: I mean, if you want
22 to -- is you want to explore the underlying

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 validity of the process that the Seattle
2 Police Department uses, that's an issue that
3 hasn't been designated but, you know, if you
4 want to expand this trial way beyond the scope
5 of what I believe to be our expertise, we can
6 attempt to do that. But I don't think that
7 this is the correct forum for that.

8 ADMIN. JUDGE SIPPEL: It's too
9 late for that. I mean, you got the burden of
10 proof, I don't.

11 MR. SCHONMAN: I don't think this
12 is the right forum for exploring the validity
13 of the process that the Seattle Police
14 Department uses.

15 ADMIN. JUDGE SIPPEL: Was
16 Detective Shilling one of the persons within
17 that department that made the determination
18 that this man was a Level 3?

19 MR. LYON: Yes.

20 ADMIN. JUDGE SIPPEL: He was?

21 MR. LYON: He was the man --

22 ADMIN. JUDGE SIPPEL: He was. So,

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

1 you couldn't expect him to go into this
2 courtroom and testify that he didn't think I
3 was right. I mean, he's already committed
4 himself to that decision. Right.

5 I mean, whether he's right, wrong
6 or indifferent, he's not going to come into
7 this courtroom and say that, you know, that
8 was wrong, Your Honor.

9 MR. SCHONMAN: Well, yes. I think
10 he's going to testify truthfully.

11 ADMIN. JUDGE SIPPEL: Well, we all
12 think that.

13 MR. SCHONMAN: I asked him --

14 ADMIN. JUDGE SIPPEL: But I'm
15 simply saying that with respect to what could
16 color his testimony and that certainly is a
17 legitimate inquiry.

18 If you have a witness who has
19 already made a predetermination on a point
20 before his testimony and he comes in and says
21 well. I already decided that long ago. You
22 know, that -- okay, then. So, I don't know

1 what you're doing here. You're not
2 establishing anything with a witness like
3 that. He said I already made my mind up.

4 MR. SCHONMAN: He can explain how
5 he reached it if that's an area that you want
6 to inquire in.

7 ADMIN. JUDGE SIPPEL: Well, I
8 don't have the burden. I'm not going to put
9 myself to a burden of what I have to do. I'm
10 just sitting here listening and he's not --
11 I'm just saying I'm not very impressed when he
12 comes in and he tells me it's the best
13 available actuarial model.

14 MR. SCHONMAN: Okay.

15 ADMIN. JUDGE SIPPEL: And he's
16 Detective Shilling. You know, I mean if it
17 was -- as I say, if it was Dr. Shilling from
18 the University of Scotland or something like
19 that. He spent his life studying models. You
20 know, that's a different situation. But this
21 man is working for a living by applying things
22 that he's told to apply.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 MR. SCHONMAN: Your Honor, I think
2 you may be underestimating the extent to which
3 he is professional in his field.

4 ADMIN. JUDGE SIPPEL: I --

5 MR. SCHONMAN: I think perhaps the
6 image of a police officer may be at odds with
7 the image that you develop after you listen
8 to--

9 ADMIN. JUDGE SIPPEL: I'm not
10 prejudiced against him --

11 MR. SCHONMAN: -- to Detective
12 Shilling.

13 ADMIN. JUDGE SIPPEL: You're
14 suggesting that I might be prejudiced against
15 him because he's a police officer. It's not
16 true.

17 MR. SCHONMAN: Your Honor I'm not
18 suggesting that.

19 What I think would be very helpful
20 to Your Honor as the trier in this case is
21 that you attribute to Detective Shilling the
22 appropriate weight and you will be impressed

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com